

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,)	8:21-CR-0212
)	
Plaintiff,)	
)	
vs.)	MOTION FOR DOWNWARD
)	VARIANCE
RAMZI YASSINE,)	
)	
Defendant.)	

COMES NOW the Defendant, by and through undersigned counsel, and moves the Court to grant a downward variance from the advisory guideline sentencing range based on the following:

1. The history and characteristics of the Defendant and the nature and circumstances of the offense, as set forth in 18 U.S.C. §3553(a);
2. Objection and policy disagreement with USSG § 2G2.2 enhancements.

WHEREFORE, Defendant prays for the relief requested.

RAMZI YASSINE, Defendant,

By: s/Sean M. Conway
SEAN M. CONWAY
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CERTIFICATE OF SERVICE

I hereby certify that on November 7, 2022, I electronically filed the foregoing Motion for Downward Departure and Variance with the Clerk of the District Court using the CM/ECF system which sent notification of such filing to the following:

Don Kleine, Assistant United States Attorney

and I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants:

N/A

s/Sean M. Conway

SEAN M. CONWAY, #23490

Attorney for Defendant